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May 6, 1997

**BY HAND DELIVERY**

Mr. William F. Caton  
Acting Secretary  
Federal Communications Commission  
1919 M Street, N.W., Room 222  
Washington, DC 20554

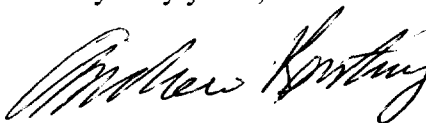
Re: Reply Comments of Bott Communications, Inc.  
MM Docket No. 97-86; RM-9025  
Camdenton, Missouri

Dear Mr. Caton:

Transmitted herewith on behalf of Bott Communications, Inc., are an original and four copies of its Reply Comments filed in the above-referenced proceeding.

Should any questions arise concerning this matter, please communicate directly with this office.

Very truly yours,



Andrew S. Kersting  
Counsel for  
Bott Communications, Inc.

Enclosures  
cc (w/ encl.): Certificate of Service

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BEFORE THE  
**Federal Communications Commission**

WASHINGTON, D.C. 20554

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In the Matter of )  
)  
Amendment of Section 73.202(b), ) MM Docket No. 97-86  
Table of Allotments, ) RM-9025  
FM Broadcast Stations )  
(Camdenton, Missouri) )  
  
To: Chief, Allocations Branch

**REPLY COMMENTS**

Bott Communications, Inc. ("Bott"), by counsel, hereby submits these reply comments in response to the "Comments of Lake Broadcasting, Inc.", filed April 21, 1997, in the above-captioned proceeding. In support of these reply comments, the following is stated:

Lake Broadcasting, Inc. ("Lake"), claims that it is an interested party in this proceeding because there is a mutual exclusivity between the proposal set forth in the Commission's *Notice of Proposed Rule Making*, DA 97-414 (released February 28, 1997) ("NPRM"), to allot Channel 265A at Camdenton, and Lake's "proposal" to allot Channel 264A to Waynesville, Missouri, which, according to Lake, is pending in three other FM rulemaking proceedings.<sup>1</sup> Lake Comments, pp. 1-2. Lake claims, however, that Channel 265A can be allotted to Camdenton with a modified site restriction of 15.2 kilometers west of the community in full compliance with the Commission's

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<sup>1</sup> See *Report and Order* in MM Docket No. 89-120 (Northwye, Cuba, Waynesville, Lake Ozark, and Eldon, Missouri), 7 FCC Rcd 1449 (Mass Med. Bur. 1992) (the "Eldon" proceeding); *Report and Order* in MM Docket No. 91-352 (Ava, Branson, and Mountain Grove, Missouri), 10 FCC Rcd 13035 (Mass Med. Bur. 1995) (the "Ava" proceeding); *Report and Order* in MM Docket No. 92-214 (Columbia, Bourbon, Leasburg, Gerald, Dixon, and Cuba, Missouri), 10 FCC Rcd 12624 (Mass Med. Bur. 1995) (the "Columbia" proceeding).

spacing requirements. *Id.* at 3. Lake therefore urges the Commission to adopt the proposal of Camdenton Community Broadcasters to allot Channel 265A to Camdenton with a modified site restriction, and specify the allotment reference coordinates for Lake's proposal to allot Channel 264A to Waynesville in the Eldon, Ava, and Columbia rulemaking proceedings, which will preserve the possibility that Lake's Station KBMX(FM), Eldon, Missouri, can be upgraded from Channel 270A to 270C1. Specifically, Lake contends that if the Commission grants its petition for reconsideration in the Eldon proceeding and allots Channel 264A to Waynesville, the conflict between the Eldon, Ava, and Columbia proceedings will be severed in a manner that will permit the Commission to allot Channel 270C1 to Lake at Eldon. *Id.* at 2.

The proposal set forth in the *NPRM* to allot Channel 265A to Camdenton should not be adopted for the reasons stated in Bott's Comments and Counterproposal, filed in this proceeding on April 21, 1997. Specifically, Bott's counterproposal to allot Channel 265C3 to Laurie will provide that community with its first local transmission service, which will promote the objectives of Section 307(b) of the Communications Act of providing a fair, efficient and equitable distribution of broadcast stations among the various states and communities.<sup>2</sup> In addition, the proposed allotment will promote the third allotment priority established in *Revision of FM Assignment Policies and Procedures*, 90 FCC 2d 88, 91 (1982), whereas the allotment of Channel 265A at Camdenton would serve only the fourth allotment priority.<sup>3</sup> Moreover, the 60 dBu contour of Camdenton Community

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<sup>2</sup> 47 U.S.C. §307(b). *See National Broadcasting Co. v. U.S.*, 319 U.S. 190, 217 (1943) (describing a goal of the Communications Act to "secure the maximum benefits of radio to all the people of the United States"); *FCC v. Allentown Broadcasting Co.*, 349 U.S. 358, 359-62 (1955) (describing a goal of Section 307(b) to "secure local means of expression").

<sup>3</sup> The criteria for determining the comparative preferability of a proposed FM allotment  
(continued...)

Broadcasters' proposal encompasses 37,250 persons within an area of 2,530 square kilometers (sq. km), while the 60 dBu contour of Bott's counterproposal to allot Channel 265C3 at Laurie would cover 56,533 persons in an area consisting of 4,592.5 sq. km. This represents an increase of 51.8% in population and 81.5% in area. See Bott's Comments and Counterproposal, p. 4, and supporting Engineering Statement, p. 2.

The Comments filed by Lake should be given little, if any, consideration because Lake's interest in seeking to preserve the availability of Channel 264A at Waynesville has no legal significance. Indeed, Lake has never expressed its interest in Channel 264A at Waynesville in the form of a petition for rulemaking or a counterproposal. As Lake acknowledges, it first expressed its interest in Channel 264A at Waynesville in the form of a "Supplement to Petition for Reconsideration," which was filed in the Eldon proceeding on January 5, 1993.<sup>4</sup> Lake Comments, p. 2. At that time, Lake's interest in Channel 264A at Waynesville was not a viable allotment proposal due to the pending proposals for Channel 265C3 at Sunrise Beach, Missouri, and Channel 265A at Osage Beach, Missouri. See Engineering Statement, p. 2 and Exhibit 3.

Although Lake also expressed its interest in Channel 264A at Waynesville on February 28, 1996, in the form of a "Reply to Opposition to Petition for Reconsideration" (at ¶¶2-3) in the Ava proceeding and in its "Consolidated Reply to Oppositions to Petition for Reconsideration" (at ¶14)

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<sup>3</sup>(...continued)

are (1) first full-time aural service; (2) second full-time aural service; (3) first local service; and (4) other public interest matters. 90 FCC 2d at 91.

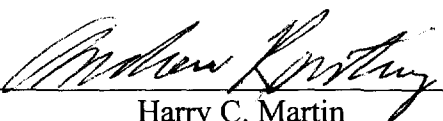
<sup>4</sup> Lake's petition for reconsideration is being held in abeyance pending the outcome of a proceeding to determine whether Lake possesses the basic character qualifications to remain a Commission licensee in light of the felony convictions of its President, Treasurer, and 67.5% stockholder, Michael Rice. See *Contemporary Media, Inc.*, 10 FCC Rcd 13685, ¶2 (1995) (*Order to Show Cause and Notice of Apparent Liability*).

in the Columbia proceeding,<sup>5</sup> neither of these expressions of interest constituted a formal request to allot Channel 264A to Waynesville. Thus, because Lake's interest in preserving the availability of Channel 264A at Waynesville has no legal significance, it cannot be considered in connection with Bott's counterproposal to allot Channel 265C3 to Laurie, Missouri. Indeed, the tenuous nature of Lake's interest in Channel 264A at Waynesville amounts to nothing more than an impermissible attempt to harbor scarce spectrum. Therefore, Lake's Comments should be given little, if any, consideration in this proceeding, and the proposal to allot Channel 265A at Camdenton, Missouri, should not be adopted for the reasons stated in Bott's Comments and Counterproposal, filed April 21, 1997.

WHEREFORE, in light of the foregoing, Bott Communications, Inc. respectfully requests that the Commission GRANT its counterproposal and AMEND the FM Table of Allotments by ALLOTING Channel 265C3 to Laurie, Missouri.

Respectfully submitted,

BOTT COMMUNICATIONS, INC.

By:   
Harry C. Martin  
Andrew S. Kersting

Its Counsel

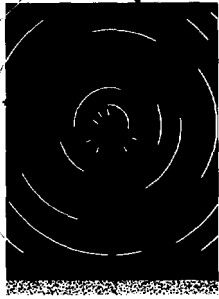
Fletcher, Heald & Hildreth, P.L.C.  
1300 N. Seventeenth Street, 11th Floor  
Rosslyn, Virginia 22209  
(703) 812-0400

May 6, 1997

c:\...bott\rm\laurierrm.rep

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<sup>5</sup> Lake Comments, p. 2.



# WHEELER BROADCAST CONSULTING

## *Engineering Report*

This consultant has been retained by Bott Communications, Inc.<sup>1</sup> for the purpose of analyzing the comments filed by Lake Broadcasting, Inc. (Lake) in MM Docket 97-86 (Camdenton, Missouri and Laurie, Missouri) and preparing technical support to a reply to the same.

In its comments, Lake asserts that, on January 5, 1993, it proposed the substitution of Channel 264 A for Channel 272 A or its previously suggested channel 221 A substitution at Waynesville, Missouri and modifying the license of KJPW accordingly. They further assert that proposal for Channel 265 A at Camdenton, Missouri, from the stated reference coordinates as proposed in Docket 97-86, would preclude the use of Channel 264 A at Waynesville. In order to resolve the conflict Lake suggests modification of the reference coordinates for 265 A at Camdenton and provides technical support purporting to demonstrate the viability of the altered reference coordinates.

This consultant analyzed the Channel 264 A substitution as it relates to the Bott Communications counterproposal for Channel 265 C3 in Laurie, Missouri and we find that the Channel 264 A substitution suggested by Lake is mutually exclusive with Bott Communications, Inc. proposal for Channel 265 C3 at Laurie.

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MISSION, KS 66202  
913.362.7282  
913.362.7287

The point nearest to Laurie where a Channel 265 C3 transmitter could be located in compliance with the minimum spacings set forth in 47 CFR 73.207 would be:

38° 05' 26" N  
93° 06' 17" W

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<sup>1</sup> Bott Communications, Inc. filed a counterproposal in Docket 97-86 seeking the allocation of Channel 265 C3 to Laurie, Missouri as its first local service.

A copy of the Commission's May 2, 1997 FM database, with the Lake, Channel 264 A proposal added<sup>2</sup>, is included in this report as Exhibit 1. The distance and bearing from that site to Laurie, Missouri is 27.2 km at 62.5° True. From that site the 70 dBu F(50,50) contour of a hypothetical Class C3 facility (25 kW at 100m HAAT) was calculated and it was determined that the 70 dBu contour of such a facility, along the 62.5° radial, would be 102.8 m HAAT and would extend only 23.5 km, 3.7 km short of covering the reference coordinates of Laurie, Missouri. A copy of a digitally generated map that depicts the lack of principal community coverage requirements is included in this report as Exhibit 2. Accordingly, Lake's proposed substitution of Channel 264 A for Channel 271 A or Channel 221 A at Waynesville is mutually exclusive with the Bott Communications, Inc. proposal for Channel 265 C3 at Laurie, Missouri.

#### **Lake's Proposal Was Not a Valid Substitution**

Lake contends it offered the substitution of Channel 264 A for Channel 271 A or the alternate proposal of Channel 221 A at Waynesville, Missouri on January 5, 1993. A copy of the Commission's January 4, 1993 database was retrieved by this consultant and a search of that database reveals that the proposed Channel 264 A substitution was in conflict at that time with 2 distinct Rulemaking proceedings. The first was a proposal to allocate Channel 265 C3 to Sunrise Beach, Missouri tendered by R. Lee and Sarah H. Wheeler<sup>3</sup> and the second was a petition for reconsideration filed by Twenty One Sound Communications<sup>4</sup> wherein it was proposed that Channel 265 A be substituted for Channel 228 A at Osage Beach, Missouri. Lake did not offer the proposed Channel 264 A substitution as a counterproposal in either the Wheeler request or the Twenty One Sound petition for reconsideration or, if it did, it failed to serve the petitioners - one of which is the undersigned. A copy of the search of the January 4, 1993 FM database, demonstrating that Channel 264 A was not available at Waynesville on January 5, 1993, is included in this report as Exhibit 3.

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<sup>2</sup> The Channel 264 A substitution for KJPW at Waynesville, Missouri is not included in the Commission's database release. Coordinates for the proposed substitution were taken from the station license of station KJPW.

<sup>3</sup> The Wheeler proposal for Channel 225 C3 at Sunrise Beach was returned on June 22, 1993 due to the conflict with the Twenty One Sound Communications Petition for Reconsideration.

<sup>4</sup> Twenty One Sound Communications' counterproposal and subsequent petitions for reconsideration have all been dismissed and denied, most recently on April 23, 1997 as released May 2, 1997.

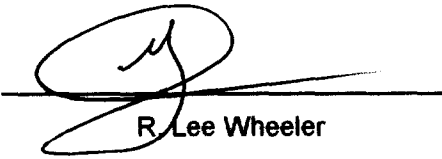
**Conclusion**

Lake Broadcasting's proposed substitution of Channel 264 A for Channel 272A or Channel 221 A at Waynesville, Missouri is mutually exclusive with Bott Communication, Inc.'s proposed first local service to Laurie, Missouri and would deny the 37,250 persons in and around Laurie an additional service as proposed by Bott Communications, Inc.. The Lake, Channel 264 A substitution at Waynesville was not a valid substitution when it was offered on January 5, 1993 and Lake should not now, over four years after the fact, be allowed to attempt cure the proposal that was defective when filed.

**Certification**

All information contained in this report is true and accurate to the best of my belief. Having had numerous matters before the Commission, my qualifications are a matter of record.

5/5/97  
Date

  
R. Lee Wheeler

WHEELER BROADCAST CONSULTING  
6025 Martway - Suite 112 - Mission KS 66202

Bott Communications, Inc.  
Laurie, MO

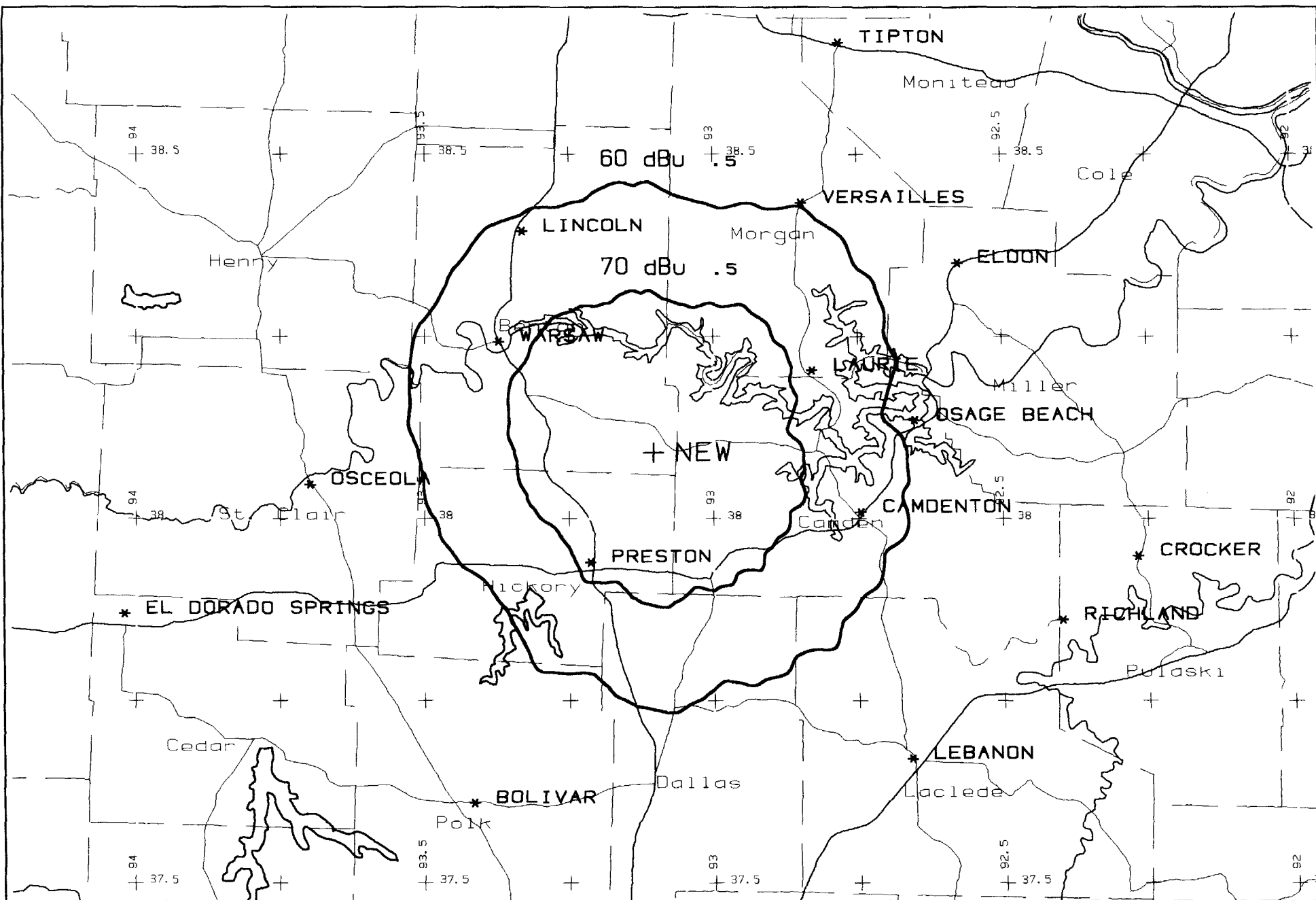
REFERENCE	CLASS C3	DISPLAY DATES
38 05 26 N		DATA 05-03-97
93 06 17 W	Current rules spacings	SEARCH 05-05-97
----- CHANNEL 265 -100.9 MHz -----		

CALL TYPE	CH# LAT	CITY LNG	STATE PWR	BEAR' HT	D-KM D-Mi	R-KM R-Mi	MARGIN (KM)
AD265	265C3	Laurie	MO	75.9	23.59	153.0	-129.41 *
AD	38 08 30	92 50 37	0.000 kW	0M	14.7	95.1	
	Bott Communications, Inc.				RM9084		970421
>Site Restriction 6km South-Counterproposal							
AD265	265A	Camdenton	MO	101.1	32.73	142.0	-109.27 *
AD	38 02 00	92 44 20	0.000 kW	0M	20.3	88.3	
	Camdenton Community Broadcast				RM9025		970203
>Site Restriction 2.9km North							
KMZU	264C1	Carrollton	MO	349.7	143.99	144.0	-0.01 *
LI CN	39 21 59	93 24 12	99.000 kW	302M	89.5	89.5	
	Kanza, Inc.				BLH900917KA		
AD264	264A	Waynesville	MO	109.6	89.01	89.0	0.01 <
AD	37 49 09	92 09 06	0.000 kW	0M	55.3	55.3	
Added 5/5/97 - Lake Broadcast							
KTXR	267C	Springfield	MO	171.4	100.59	96.0	4.59
LI CY	37 11 40	92 56 04	100.000 kW	360M	62.5	59.7	
	Stereo Broadcasting, Inc.				BLH920625KB		
KCFX	266C1	Harrisonville	MO	312.8	162.38	144.0	18.38
LI EN	39 04 24	94 29 06	97.000 kW	303M	100.9	89.5	
	KCFX-FM, Inc.				BLH900917KC		
AP212	212A	Sunrise Beach	MO	61.1	33.70	12.0	21.70
AP VN	38 14 11	92 46 03	3.800 kW	60M	20.9	7.5	
	Community Broadcasting, Inc.				BPED970110MA		
>Vertical Polarization Only							
KTUIFM	265A	Sullivan	MO	85.4	168.54	142.0	26.54
LI CN	38 11 42	91 11 12	3.000 kW	84M	104.8	88.3	
	Four Rivers Broadcasting Co.				BLH810223AG		
ALOPEN	265C2	Salem	AR	142.2	209.31	177.0	32.31
AL N	36 35 38	91 40 03	0.000 kW	0M	130.1	110.0	
>Reserved for KSAR per one-step application 970410IC							

WHEELER BROADCAST CONSULTING  
6025 Martway - Suite 112 - Mission KS 66202

CLASS C3

CALL TYPE	CH# LAT	CITY LNG	STATE PWR	BEAR' HT	D-KM D-Mi	R-KM R-Mi	MARGIN (KM)
KSAR.A	265C2	Salem	AR	142.2	209.31	177.0	32.31
AP CN	36 35 38	91 40 03	50.000 kW	150M	130.1	110.0	
Bragg Broadcasting, Inc. BPH970410IC							
>One-step application from Channel 265A (from Channel 240A per D96-4							
KPLA.A	268C1	Columbia	MO	39.3	114.98	76.0	38.98
AP ZCN	38 53 16	92 15 48	95.000 kW	145M	71.5	47.2	
Columbia FM, Inc. BPH930813IC							
>From Channel 268C2 per D89-558							
AD264	264C3	Deerfield	MO	253.0	138.40	99.0	39.40
AD	37 43 01	94 36 22	0.000 kW	0M	86.0	61.5	
Deerfield FM Radio RM9052 970307							
>Site Restriction 16.2km Southwest							
ALOPEN	268C1	Columbia	MO	29.1	122.22	76.0	46.22
AL N	39 03 00	92 25 00	0.000 kW	0M	76.0	47.2	
>Effective 5-15-92-Reserved for KARO per D90-527							
KPLA.C	268C2	Columbia	MO	41.9	105.08	56.0	49.08
CP ZCN	38 47 28	92 17 43	20.000 kW	184M	65.3	34.8	
Columbia FM, Inc. BPH890921ID 921027							
>*To Channel 268C1 per D89-558-From Channel 269A per D86-103							



Scale in km



NEW 265C3 25kW

N. Lat. 38 05 26

W. Lng. 93 06 17

EXHIBIT 2

L. WHEELER - 05/97

WHEELER BROADCAST CONSULTING  
3718 W. 52nd Terrace - Shawnee Mission KS. 66205

Channel 264 A - January 1993  
Waynesville, MO

REFERENCE	CLASS A	DISPLAY DATES
37 49 09 N		DATA 01-04-93
92 09 06 W	Current rules spacings	SEARCH 05-05-97
----- CHANNEL 264 -100.7 MHz -----		

CALL TYPE	CH# LAT	CITY LNG	STATE PWR	BEAR' HT	D-KM D-Mi	R-KM R-Mi	MARGIN (KM)
AD265	265C3	Sunrise Beach	MO	302.6	69.33	89.0	-19.67 *
AD	38 09 20	92 49 00	0.000 kW	OM	43.1	55.3	
	R. Lee and Sarah Wheeler						921030
>Site Restriction 3.6km Southwest							
AD265	265A	Osage Beach	MO	306.3	57.31	72.0	-14.69 *
AD	38 07 29	92 40 39	0.000 kW	OM	35.6	44.8	
	Twenty-One Sound Communicatio						920616
					RM7139		
AD263	263A	Leasburg	MO	78.3	72.23	72.0	0.23 <
AD	37 57 05	91 20 52	0.000 kW	OM	44.9	44.8	
	Jeff Weinhaus						921110
>Counterproposal-Alternate channel-Site Restricted 16km South							
KTXR	267C	Springfield	MO	224.9	97.97	95.0	2.97 <
LI CY	37 11 40	92 56 04	100.000 kW	360M	60.9	59.0	
	Stereo Broadcasting, Inc.						BLH920625KB
KMZU	264C1	Carrollton	MO	327.6	203.44	200.0	3.44
LI CN	39 21 59	93 24 12	99.000 kW	302M	126.4	124.3	
	Kanza, Inc.						BLH900917KA
KGMO.C	264C	Cape Girardeau	MO	102.1	236.72	226.0	10.72
CP CN	37 22 16	89 31 52	100.000 kW	301M	147.1	140.5	
	W. Russell Withers, Jr.						BPH870225IJ
KTUIFM	265A	Sullivan	MO	63.8	94.46	72.0	22.46
LI CN	38 11 42	91 11 12	3.000 kW	84M	58.7	44.8	
	Four Rivers Broadcasting Co.						BLH810223AG
KJMO.C	261C2	Jefferson City	MO	344.0	81.33	55.0	26.33
CP CN	38 31 25	92 24 25	33.000 kW	183M	50.5	34.2	
	Triple-D Properties, Inc.						BPH890629IE
>From Channel 261A per D87-294							
KGAR	262C2	Willow Springs	MO	172.5	84.57	55.0	29.57
LI CN	37 03 49	92 01 39	50.000 kW	150M	52.6	34.2	
	One Hundred & One Communicati						BLH890511KA
AD265	265A	Hermitage	MO	280.2	105.96	72.0	33.96

WHEELER BROADCAST CONSULTING  
3718 W. 52nd Terrace - Shawnee Mission KS. 66205

CLASS A

CALL TYPE	CH# LAT	CITY LNG	STATE PWR	BEAR' HT	D-KM D-Mi	R-KM R-Mi	MARGIN (KM)
AD	37 59 17	93 20 15	0.000 kW	OM	65.8	44.8	
	KYOU Broadcasting Company				RM8104		
KGMO	264C1	Cape Girardeau	MO	102.1	236.72	200.0	36.72
LI CN	37 22 16	89 31 52	100.000 kW	213M	147.1	124.3	
	W. Russell Withers, Jr.				BLH841214LL		
KGMY.C	263C2	Aurora	MO	236.4	145.23	106.0	39.23
CP CN	37 05 39	93 31 05	33.000 kW	183M	90.3	65.9	
	Aurora Broadcasting, Inc.				BPH890303IF		
KTTK.C	210A	Lebanon	MO	251.2	49.24	10.0	39.24
CPM CN	37 40 34	92 40 50	0.390 kW	46M	30.6	6.2	
	Lebanon Educational Broadcast				BMPED920706IA		
KKCA	263A	Fulton	MO	8.5	117.49	72.0	45.49
LI CN	38 51 58	91 57 15	6.000 kW	91M	73.0	44.8	
	Kfal, Inc.				BMLH900718KB		

**CERTIFICATE OF SERVICE**

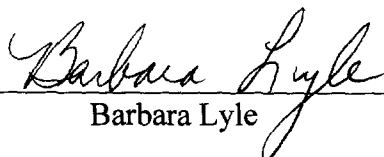
I, Barbara Lyle, a secretary in the law firm of Fletcher, Heald & Hildreth, P.L.C., hereby certify that on this 6th day of May, 1997, copies of the foregoing Reply Comments were hand delivered or mailed first-class, postage prepaid, to the following:

John A. Karousos, Chief\*  
Allocations Branch  
Policy and Rules Division  
Mass Media Bureau  
Federal Communications Commission  
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Washington, DC 20554

Ms. Kathleen Scheuerle\*  
Allocations Branch  
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